



Kevin Kehrli
164 W. 25th Street, Suite 11
E: kk@gs2law.com
P: +1.212-380-3623

Hon. Magistrate Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

May 9, 2023

Via ECF

Re: Viola et al v. Whitestone, Inc. et al (21-cv-6691(DG)(CLP)): Request for Extension of Discovery

Dear Judge Pollak,

This firm represents all defendants in the above-referenced action. I write with consent of Mr. Peter Lee, counsel for plaintiffs, to request an adjournment of the present discovery deadlines in the matter.

Following a conference before the Court held on February 15th, 2023, Your Honor directed that outstanding discovery responses be served by February 28, 2023 and depositions be completed by mid May. On March 3, 2023, Plaintiffs filed a request for an extension of time to serve its discovery responses. The Court granted the request extending Plaintiffs time to respond to March 17, 2023, and Plaintiffs served responses on that day.

On April 27, 2023, Plaintiffs served Notices of Deposition for each defendant, as well as an email raising various issues with Defendants' discovery responses. On May 4, 2023, I contacted Mr. Lee to inform him that I was unavailable for the dates noticed for deposition (May 18th and May 19th) as I will be out of the country for another matter. Accordingly, we consented to seek an extension of time to complete depositions.

Earlier today, I provided Mr. Lee with a response to his discovery deficiency email, and our deficiency letter regarding Plaintiffs' responses. We will be coordinating our "meet and confer" on the issues promptly.

Accordingly, the parties jointly request an extension of time to complete deposition to June 30, 2023.

Thank you in advance for the Court's time and consideration.

Respectfully Submitted,

_____/s/
Kevin Kehrli